

NICHOLAS VASSALLO
United States Attorney
JEREMY A. GROSS (WY Bar #7-5110)
Assistant United States Attorney
P.O. Box 668
Cheyenne, WY 82003-0668
Telephone: 307-772-2124
jeremy.gross@usdoj.gov

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

JEREMY S.B. NEWMAN (*PRO HAC VICE*)
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L St. NW
Washington, DC 20005
Phone: (202) 532-3114
jeremy.s.newman@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

Jake Stanley De Wilde, Individually and as)
Trustee of the DEWILDE ARMS TRUST,)
Plaintiff,) Case No. 1:23-cv-00003-SWS
v.)
Attorney General of the United States;)
Director of the Bureau of Alcohol,)
Tobacco, Firearms, and Explosives,)
Defendants.)

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION FOR LEAVE TO AMEND COMPLAINT**

Defendants Merrick Garland, in his official capacity as the Attorney General of the United States of America, and Steven Dettelbach, in his official capacity as the Director of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, through undersigned counsel, hereby respond to Plaintiff's Motion for Leave to Amend Complaint (Doc. 11). Defendants are not opposed to this Motion. However, Defendants reserve all rights with respect to the proposed Amended Complaint, including the right to move to dismiss pursuant to Federal Rule of Civil Procedure 12.

Dated this 16th day of March, 2023.

Respectfully Submitted,

NICHOLAS VASSALLO
United States Attorney

By: /s/ Jeremy A. Gross
JEREMY A. GROSS
Assistant United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

/s/ Jeremy S.B. Newman
JEREMY S.B. NEWMAN (*Pro Hac Vice*)
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L St. NW
Washington, DC 20005
Phone: (202) 532-3114
Email: jeremy.s.newman@usdoj.gov